

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JACKIE TIDWELL,

CIVIL ACTION NO. 1:13-cv-05701

Plaintiff/Petitioner,

-vs-

ZHEJIANG JIANDI TRADING & INDUSTRIAL
CO., LTD.,

Defendant/Respondent,

and

TV PRODUCTS USA, INC., WALMART STORES,
INC., BIG LOT STORES, INC.,

Garnishees.

TABLE OF CONTENTS FOR NOTICE OF PAPERS IN OPPOSITION
AND CROSS-MOTION

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- Exhibit A referenced at paragraph 16 [Proposed Answer]

AFFIDAVIT OF BRIAN HENNELLY SWORN TO
NOVEMBER 3, 2013 3

- Exhibit B referenced at paragraph 7
[Letter of T. Andrew Brown, Esq., dated October 29, 2013]

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JACKIE TIDWELL,

Plaintiff/Petitioner,

-vs-

**ZHEJIANG JIANDI TRADING & INDUSTRIAL
CO., LTD.,**

Defendant/Respondent,

and

**NOTICE OF WAL-MART
STORES, INC.'S PAPERS IN
OPPOSITION TO DEFAULT
PETITIONER'S MOTION FOR
JUDGMENT AND IN SUPPORT
OF WAL-MART STORES, INC.'S
CROSS-MOTION TO VACATE
THE ENTRY OF DEFAULT
ENTERED IN THE SDNY'S
CLERK'S OFFICE**

CIVIL ACTION NO. 1:13-cv-05701

**TV PRODUCTS USA, INC., WALMART STORES,
INC., BIG LOT STORES, INC.,**

Garnishees.

SUBMITTED BY:

Brown & Hutchinson
T. Andrew Brown, Esq.
Attorneys for Garnishee
Wal-Mart Stores, Inc.

**DATE, TIME & PLACE
OF HEARING:**

Time and Date to be set by Court
United States District Courthouse
500 Pearl Street
New York, New York

SUPPORTING PAPERS:

Affirmation of T. Andrew Brown, Esq. dated December 3,
2013, with attached exhibit, Affidavit of Brian Hennelly,
Sworn to December 3, 2013 and Memorandum of Law
dated December 3, 2013.

RELIEF DEMANDED:

An Order denying Petitioner's Motion for a Default
Judgment Pursuant to FRCP Rule 55 and in support of
Wal-Mart Store, Inc.'s Cross-Motion to Vacate the Entry of
Default entered in the Southern District of New York's
Clerk's office pursuant to FRCP Rule 55(c).

NATURE OF ACTION:

Turnover Proceeding.

Dated: December 3, 2013
Rochester, New York

BROWN & HUTCHINSON

S/

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